

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
MADELINE S. LAL
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Madeline_Nelson@fd.org

6 Attorney for Charlene Scott
7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 CHARLENE SCOTT,
15 Defendant.

Case No. 2:15-cr-00174-KJD-BNW

**Stipulation to Continue Supplement's
Deadline to Motion for
Compassionate Release
(First Request)**

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and Madeline
20 S. Lal, Assistant Federal Public Defender, counsel for Charlene Scott, request that the due date
21 for Ms. Scott's Supplement to Motion for Compassionate Release (ECF No. 461), be extended
22 from January 17, 2024, to April 16, 2024; and that the due date for the government's response
23 be extended until April 30, 2024.

24 This Stipulation is entered into for the following reasons:

25 1. On January 4, 2024, Ms. Scott filed a motion seeking an order reducing her
26 sentence or modifying her judgment under the compassionate release statute at 18 U.S.C. §§
3582(c) and 3553(a). ECF No. 461.

2. Defense counsel has not had the opportunity to speak with Ms. Scott to discuss related issues to the motion.

3. Defense counsel needs additional time to investigate Ms. Scott's personal and family medical issues, which are pertinent to the supplement.

4. The additional time requested by the stipulation is made in good faith and not for purposes of delay.

5. The defendant is in custody and agrees with the need for a continuance.

6. The parties agree to the continuance.

This is the first request for a continuance of the supplement deadline.

DATED this 12th day of January, 2024.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

By /s/ Madeline S. Lal
MADELINE S. LAL
Assistant Federal Public Defender

By /s/ Kimberly M. Frayn
KIMBERLY M. FRAYN
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CHARLENE SCOTT,

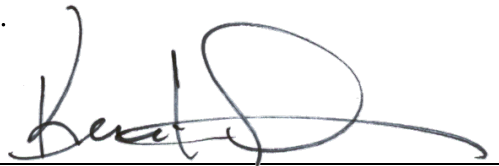
7 Defendant.

Case No. 2:15-cr-00174-KJD-BNW

ORDER

9
10 IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to
11 Extend Deadline for filing her Supplement to Motion for Compassionate Release, that the
12 Defendant's deadline to file his Supplement is extended to April 16, 2024; and that the
13 Government's deadline to file its response is extended to April 30, 2024.

14 DATED this 12th day of January, 2024.

15
16 

17 UNITED STATES DISTRICT JUDGE